

**Timothy Jacquez**  
**February 7, 2017**

<p style="text-align: right;"><b>Page 26</b></p> <p>1 Q. And that was what time, April 2015?</p> <p>2 A. April, I believe so -- April, May. I can't</p> <p>3 remember. It's been --</p> <p>4 Q. Spring?</p> <p>5 A. Yeah, spring.</p> <p>6 Q. Of 2015?</p> <p>7 A. Yeah.</p> <p>8 Q. And how long were you employed by</p> <p>9 ProDrivers?</p> <p>10 A. 13 months.</p> <p>11 Q. Until what date?</p> <p>12 A. I can't remember the exact date. It was</p> <p>13 June 20 something. I can't remember -- June</p> <p>14 something of 2016 -- late June.</p> <p>15 Q. And where did you go work after ProDrivers?</p> <p>16 A. RivenRock Staffing.</p> <p>17 Q. What date did you start at RivenRock?</p> <p>18 A. I can't even remember the exact date.</p> <p>19 Q. Was it in June of 2016?</p> <p>20 A. June of 2016, yeah.</p> <p>21 Q. Are you currently still employed by</p> <p>22 RivenRock?</p> <p>23 A. I am.</p> <p>24 Q. Besides RivenRock have you worked with any</p> <p>25 other company since leaving ProDrivers?</p>	<p style="text-align: right;"><b>Page 28</b></p> <p>1 Q. You said one of the reasons was commissions</p> <p>2 not being paid?</p> <p>3 A. Right.</p> <p>4 Q. Tell me about that?</p> <p>5 A. Well, in standard with Volt Workforce</p> <p>6 Solutions, when you get paid commission on top of a</p> <p>7 salary, you can get a commission report. You can see</p> <p>8 a breakdown of what you get paid and how you get</p> <p>9 paid, and why you get paid that.</p> <p>10 I was never able to obtain one of those. I</p> <p>11 think the entire time I was with ProDrivers, I only</p> <p>12 got one, and that was in the very beginning. And the</p> <p>13 way the commission was explained to me at the time of</p> <p>14 hire, before I even got hired, was not actually the</p> <p>15 case.</p> <p>16 There were a lot of factors that were being</p> <p>17 brought into my commission that were never brought to</p> <p>18 my attention by Mike DeLusque when I first</p> <p>19 interviewed with him, and Tom Snable -- factors that</p> <p>20 would bow into taking your commissions out, why.</p> <p>21 They just said you get a certain percentage and they</p> <p>22 didn't explain that there's all of these factors that</p> <p>23 have to meet up right to get your commission.</p> <p>24 So I wasn't paid commission correctly ever.</p> <p>25 And never could get a report. When I asked for a</p>
<p style="text-align: right;"><b>Page 27</b></p> <p>1 A. No.</p> <p>2 Q. How did your employment with ProDrivers</p> <p>3 end?</p> <p>4 A. I gave a letter of resignation, which I</p> <p>5 gave to Fran Scott, and I gave to Mike DeLusque,</p> <p>6 which was at the time my vice-president of our</p> <p>7 region. E-mailed him a copy, since he's not in our</p> <p>8 office, hand gave one and e-mailed one to Fran and</p> <p>9 myself -- gave her a copy as well.</p> <p>10 Q. And so you resigned from ProDrivers?</p> <p>11 A. Yes.</p> <p>12 Q. Why did you resign?</p> <p>13 A. There were a lot of things I was not happy</p> <p>14 with since 2015 -- end of 2015, that I didn't want to</p> <p>15 be part of that organization anymore. There were a</p> <p>16 lot of issues I was unhappy with.</p> <p>17 Q. What were those things?</p> <p>18 A. Commissions not being paid correctly, being</p> <p>19 forced to change pay rates on drivers. Unethical,</p> <p>20 things didn't feel were right -- forgery, fraud.</p> <p>21 There were a lot of things that personally I don't --</p> <p>22 the way I was brought up and the way with family,</p> <p>23 that you don't just do that to people. Changing pay</p> <p>24 rates and messing with people's pay, and forgery, I</p> <p>25 can't do that. I'm not doing that.</p>	<p style="text-align: right;"><b>Page 29</b></p> <p>1 generation of reports -- of commission reports, there</p> <p>2 wasn't one. Or if I did get one, they would make</p> <p>3 sure to tell you, Well, these numbers are wrong,</p> <p>4 so -- I mean, They're not correct numbers. So that</p> <p>5 is not going to be an accurate number. So I really</p> <p>6 had nothing to go on at all the whole time I was</p> <p>7 there.</p> <p>8 Q. Other than the one report that you got --</p> <p>9 if you didn't get reports, how did you know that your</p> <p>10 commissions weren't paid correctly?</p> <p>11 A. Because they kept telling us -- our senior</p> <p>12 manager, which would be Mike DeLusque, Fran Scott,</p> <p>13 the numbers aren't correct. So if the numbers aren't</p> <p>14 correct, your commission isn't right.</p> <p>15 Q. Which numbers aren't correct?</p> <p>16 A. The GM numbers for the office, your what</p> <p>17 they call EBRADA, all of these different numbers were</p> <p>18 not accurate. They just kept saying they're not</p> <p>19 accurate, so I didn't understand what's not accurate</p> <p>20 and they couldn't give you a solid reason what's not</p> <p>21 accurate. They kind of would fluff it off and be,</p> <p>22 like, it will be better. Don't worry. We'll make it</p> <p>23 right, is what they would always say, but it was</p> <p>24 never made right.</p> <p>25 Q. I heard you cough. If you need to take a</p>

**U.S. LEGAL SUPPORT**  
**800-993-4464**